

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

DSCF STANDARD MAIL LOAD LEVELING

Docket No. N2014-1

**UNITED STATES POSTAL SERVICE OBJECTION TO
PUBLIC REPRESENTATIVE INTERROGATORY
(PR/USPS-T1-25)
(January 31, 2014)**

Pursuant to Rule 3001.26(c), the United States Postal Service hereby objects to PR/USPS-T1-25 filed by the Public Representative on January 24, 2013. The interrogatory is stated verbatim below, and the basis for the objection follows.

PR/USPS-T1-25

The Postal Service recently announced plans to delay Phase 2 of its Network Rationalization Initiative.

- a. Please confirm that the Postal Service plans to delay Phase 2 of its Network Rationalization Initiative. If not confirmed, please explain.
- b. Please discuss and explain in detail the interaction between the Load Leveling Plan and Mail Processing Network Rationalization (MPNR).
 - i. Please provide the savings realized as a result of Phase 1 of MPNR.
 - ii. Please provide an estimate of how implementation of the Load Leveling Plan will impact savings realized from Phase 1 of MPNR.
 - iii. Please provide the estimated savings expected to be realized through implementation of Phase 2 of MPNR.
 - iv. Please provide an estimate of how implementation of the Load Leveling Plan will impact savings expected to be realized from Phase 2 of MPNR.
- c. Did Phase 1 of MPNR impact the volume of mail delivered on Mondays? Please identify, describe, and provide all documents detailing the impact of Phase 1 of MPNR on the percentage of volume delivered on Mondays.
- d. Is Phase 2 of MPNR expected to impact the volume of mail delivered on Mondays to meet service standards? Please identify,

- describe, and provide all documents detailing the impact of Phase 2 of MPNR on the percentage of volume delivered on Mondays.
- e. Did Phase 1 of MPNR impact the percentage of carriers on the street after 1700? Please identify, describe, and provide all documents detailing the impact of Phase 1 of MPNR on carriers working after 1700.
 - f. Will Phase 2 of MPNR impact the percentage of carriers on the street after 1700? Please identify, describe, and provide all documents detailing the impact of Phase 2 of MPNR on carriers working after 1700.

While the Postal Service can confirm that it has postponed the implementation of the second phase of Network Rationalization (see Revised Service Standards for Market-Dominant Mail Products; Postponement of Implementation Date, 79 Fed. Reg. 4079 (Jan. 24, 2014)), the entirety of PR/USPS-T1-25 requests detailed information regarding Network Rationalization, which was covered extensively in PRC Docket No. N2012-1. Such information is also beyond the limited scope of the current docket.

Specifically, subpart (b) requests information regarding the savings realized or expected to be realized by Network Rationalization; subparts (c) and (d) request information regarding the impact of Network Rationalization on volume; and subparts (e) and (f) request information regarding the impact of Network Rationalization on carriers working past 1700. Such inquiries are wholly irrelevant to the Postal Service's request for an advisory opinion on its Load Leveling Plan. Network Rationalization, as it relates to savings, mail volume, or carrier schedules, is not at issue in this docket. The request for an advisory opinion in this case is focused and limited in scope. The Postal Service seeks an advisory opinion as to whether the Load Leveling Plan conforms to applicable policies in Title 39, United States Code. Additionally, neither the testimony of Witness Malone, nor the testimony of Witness Anderson, reference or rely on any information related to this interrogatory.

Moreover, the portions of the interrogatory that specifically relate to Phase 2 of Network Rationalization are even further beyond the scope of this docket. Specifically, subparts (b)(iii) and (b)(iv), subpart (d), and subpart (f) request that the Postal Service estimate the impact of Phase 2 of Network Rationalization on savings, volume, and carrier schedules, respectively. However, Phase 2 changes the service standards for First-Class Mail and Periodicals only, and does not impact the service standards for Standard Mail, which is the subject of this docket.

Neither the results of Network Rationalization (actual or anticipated), nor the interaction between Network Rationalization and Load Leveling, fall within the limited scope of the request in this docket.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno
Chief Counsel Global Business & Service
Development

Caroline R. Brownlie

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260
(202) 268-3010; Fax -5402
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